

Date: September 20, 2007

COMBINED NOTICE OF  
FINDING OF NO SIGNIFICANT IMPACT AND  
NOTICE TO PUBLIC OF REQUEST FOR RELEASE OF FUNDS

TO ALL INTERESTED GOVERNMENTAL AGENCIES AND PUBLIC GROUPS

On October 9, 2007, Lewis and Clark County will request the Montana Department of Commerce (DOC) to release Community Development Block Grant (CDBG) funds provided under Title I of the Housing and Community Development Act of 1974, as amended (PL 93-383), for the following project:

<b>Project:</b>	<b>Lewis &amp; Clark County Fairgrounds/Dunbar Area Water System Infrastructure Improvements</b>
Location:	Lewis & Clark County, Montana
Total Cost:	\$1,631,341
TSEP Grant:	\$596,420
SRF Loan:	\$344,274
Mill Levy:	\$335,950
RRGL Grant:	\$100,000
CDBG Grant:	\$254,097
Private Funds:	\$600

An environmental review has been performed on the aforementioned project, as required by state and federal rules for determining whether an Environmental Impact Statement is necessary

Project Summary

The Lewis and Clark County Commissioners, through a 2004 Infrastructure Study Preliminary Engineering Report (PER) and a 2006 Water System PER both prepared by Stahly Engineering and Associates, have investigated the need for centralized public water supply and wastewater collection facilities to serve the Lewis and Clark Fairgrounds/Dunbar Area. This area included the fairgrounds, Woodlawn Park Addition, and the Labor Union Associated General Contractors (AGC) Training Facility. This area was chosen for study following a report developed by the Lewis and Clark County Environmental Health Division that identified priority projects within Lewis and Clark County. A number of problems have been defined in this area including failing septic systems, inadequate fire flows, and unacceptable nitrate levels in the domestic water systems.

The type of water infrastructure within the study area varies; the core area of the fairgrounds is connected to the City of Helena's water system. The Woodlawn Park area is served by an estimated 45 private wells and one community well. The AGC area and the Green Meadow Market are served by public water supply wells.

The recommended water alternatives include the following improvements:

- Fairgrounds - Construct the *Green Meadow Loop* connecting the existing Fairgrounds water system to the Northgate Meadows water main on the east side of Green Meadow Drive. Also, recommended was the *North Fairgrounds Loop* that would service the campground area, north barn area and rodeo grounds. However, in the interest of reducing costs, the expansion of the fairgrounds water system will only extent to the north far enough to provide service and fire flows to the new exhibit building and existing stables.

- Woodlawn Park Addition – Install a new water distribution system within the Woodlawn area and along Custer Avenue and Green Meadow Drive. This system would be connected to the City of Helena’s water distribution system.
- AGC Training Facility - Connect the AGC facility to the existing City water main that services the Fairgrounds.

Public health issues regarding water quality are the driving factors in choosing the action alternatives for the Woodlawn Park Addition and the AGC Training Facility. By replacing drinking water wells with a connection to the City’s water system the potential for contamination of wells from aging septic systems or other sources is eliminated. This public connection will also provide the residential community of Woodlawn Addition with improved fire fighting capabilities through the installation of hydrants and flows adequate for fire protection. Likewise, the Fairgrounds benefits from action alternatives because those alternatives allow improved fire flows within the water system and an ability for the facility to expand the services they can provide to the community.

#### Finding of No Significant Impact

It has been determined that such request for release of funds will not constitute an action significantly affecting the quality of the human environment. Accordingly, Lewis and Clark County and the Montana Department of Environmental Quality (DEQ) have decided not to prepare an Environmental Impact Statement under the National Environmental Policy Act of 1969 (PL 91-190).

The reasons for the decision not to prepare an Environmental Impact Statement are:

- The project will help protect the public health by replacing individual, contaminant susceptible, water supply wells with a distribution system connected to the City of Helena. The project will also improve public health and safety by adding or improving fire protection at the Fairgrounds, Woodlawn subdivision and AGC facility. Land use for the general area will not change significantly.
- Environmentally sensitive characteristics such as wetlands, floodplains and threatened or endangered species are not expected to be adversely impacted as a result of the proposed project. No significant negative long-term environmental impacts were identified.

An Environmental Review Record prepared by Lewis and Clark County and an Environmental Assessment Checklist completed by the DEQ document review of all project activities with respect to impacts on the environment are attached to this Finding of No Significant Impact and Request for Release of Funds. These documents are available for public scrutiny on DEQ web site (<http://www.deq.state.mt.us/ea.asp>) and also available for public examination and copying upon request between the hours of 9:00 AM and 4:00 PM at the following locations:

Montana Department of Environmental Quality 1520 East Sixth Avenue P.O. Box 200901 Helena, Montana 59620	City/County Building, Room 304, 316 North Park Avenue Helena, Montana, 59623
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No further environmental review of such project is proposed to be conducted prior to the request for release of CDBG project funds.

#### Release of Funds

Anticipated funding for the project is from a Community Development Block Grant, a Treasure State Endowment Program Grant, and a Renewable Resource Grant and Loan program grant administered by the Department of Natural Resources and Conservation, a mill levy, private funds and a Drinking Water State Revolving Fund loan from the Department of Environmental Quality.

Lewis & Clark County will undertake the project described above with CDBG funds provided by DOC under Title I of the Housing and Community Development Act of 1974, as amended. The county is certifying to DOC that Laura Erikson, Lewis and Clark County Grants Coordinator in her official capacity as environmental certifying officer, consents to accept the jurisdiction of the federal courts if an action is brought to enforce responsibilities in relation to environmental reviews, decision-making and action, and that these responsibilities have been satisfied. The legal effect on the certification is that upon its approval, the county may use the CDBG funds and DOC will have satisfied its responsibilities under the National Environmental Policy Act of 1969.

#### Public Comments or Objections on Findings

For purposes of CDBG funding, all interested agencies, groups and persons disagreeing with this decision are invited to submit written comments for consideration by the county to Room 304 of the City/County Building on or before October 8, 2007. All such comments so received will be considered and the county will not request release of funds or take any administrative action on the project prior to the date specified in the preceding sentence.

Comments supporting or disagreeing with this decision may also be submitted to DEQ and DOC for consideration. DOC will accept an objection to its approval for State Release of Funds only if it is on at least one of the following bases:

1. that the certification was not in fact executed by the certifying officer or other officer of the applicant approved by DOC, or
2. that the applicant's environmental review record for the project indicates omission of a required decision, finding or step applicable to the project in the environmental review process.

Objections to be considered by DEQ or DOC must be prepared and submitted in accordance with the required procedures (24 CFR Part 58) and may be addressed to one of the following agencies:

1. Department of Commerce, Local Government Assistance Division, 1424 9th Avenue, P.O. Box 200501, Helena, Montana 59620-0501.
2. Department of Environmental Quality, Planning, Prevention and Assistance Division, 1520 East Sixth Avenue, P.O. Box 200901, Helena, Montana 59620-0901.

DOC will not consider objections to the release of funds on bases other than those stated above. After evaluating the objections and comments received, the agencies will make a final decision. However, no administrative action will be taken on the project for at least 30 calendar days after publication of the Finding of No Significant Impact. For CDBG funding purposes, no objection received after October 8, 2007, will be considered by DOC.

The following documents have been utilized by DEQ and Lewis and Clark County in the preparation of the Environmental Assessment Checklist and Environmental Review Record:

1. Lewis and Clark Fairgrounds/Dunbar Area, Infrastructure Study, Preliminary Engineering Report, April 2004, prepared by Stahly Engineering & Associates, Helena, Montana.
2. Lewis and Clark Fairgrounds/Dunbar Area, Water System Upgrade, Preliminary Engineering Report, April 2006, prepared by Stahly Engineering & Associates, Helena, Montana.

Sincerely,

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Todd Teegarden, P.E., Bureau Chief  
Technical and Financial Assistance Bureau  
Planning, Prevention & Assistance Division  
Department of Environmental Quality

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Laura Erikson, Lewis and Clark County  
Grants Coordinator  
Environmental Certifying Officer  
Lewis and Clark County, Montana

## EXHIBIT 2-M

### MONTANA COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM

### CONSOLIDATED ENVIRONMENTAL ASSESSMENT FORM

#### Introduction

The following form is for the use of Community Development Block Grant (CDBG) recipients who must prepare an Environmental Assessment (EA) as required by HUD Environmental Review procedures for the CDBG program (24 CFR 58.36). Satisfactory completion of this form will meet the requirements of the federal housing and Community Development Act as well as the National Environmental Policy Act (NEPA).

CDBG recipients must also demonstrate compliance with the environmental requirements of the other related federal environmental laws and regulations listed in the HUD Statutory Checklist (24 CFR 58.5). For this reason, the Statutory Checklist requirements have been combined into this single consolidated form. An index of the applicable federal statutes and regulations is found at the end of this form. Where noted, the numbers that appear to the right of the environmental subject areas listed in the checklist correspond to the listing of statutes found in the index.

The requirements of the Montana Environmental policy Act (MEPA) and the uniform State administrative rules adopted pursuant to the Act have also been integrated into the consolidated form.

#### Project identification

Recipient: Lewis and Clark County

Chief Elected Official: Michael A. Murray

Environmental Certifying Officer: Laura Erikson

CDBG Contract #: MT-CDBG-07PF-07

Project Name: Lewis & Clark Fairgrounds/Dunbar Area Water System Upgrade

Person Preparing this  
Environmental Assessment: Robert Ashton,  
Drinking Water State Revolving Fund Program  
Montana Department of Environmental Quality

Phone Number: (406) 444-5316

## Instructions for Completing this Form

The following instructions should be presented and evaluated in a level of detail which is appropriate to the following considerations:

- (a) the complexity of the proposed action,
- (b) the environmental sensitivity of the area affected by the proposed action,
- (c) the degree of uncertainty that the proposed action will have a significant impact on the quality of the human environment, and
- (d) the need for and complexity of mitigation required avoiding significant environmental impacts.

**In all cases, the CDBG grant recipient should reference and attach additional narrative providing the specific information requested or documentation supporting the evaluation of the impact of the proposed project or activity as it relates to each environmental subject area.** The narrative should also note, where applicable, the source of the evaluation, including date of contact, page reference to pertinent source documents, and the name and title or persons contacted, along with the name of the specific organization or agency.

Environmental information and assistance in preparing an environmental assessment can be obtained from a wide variety of sources. Possible sources of information include existing plans and studies, knowledgeable local residents and officials such as the county sanitarian, city or county planning board or department, local officials with the U.S. Soil and Conservation Service (SCS) or local conservation district, as well as local representatives of the State Fish, Wildlife & Parks Department, to list just a few examples. Grant recipients may also contact the State and federal agencies listed in **Exhibit 2-O** for information and assistance.

The Department of Commerce Community Development Bureau maintains copies of environmental assessments prepared on previous projects that may be useful to grant recipients, as well as full copies of applicable federal and State environmental statutes and related information. Copies of the HUD publication, *Environmental Review Guide for Community Development Block Grant (CDBG) Programs*, can be requested from the CDBG program specialist assigned to your project.

## Evaluation of Environmental Impact

Provide the information requested below and attach additional narrative as appropriate.

- 1. Describe the proposed action or activity; including construction and end-product (attach maps and graphics as necessary).**

Activity includes:

- Fairgrounds - Construct the Green Meadow Loop connecting the existing Fairgrounds water system to the Northgate Meadows water main on the east side of Green Meadow Drive. The project also includes the expansion of the Fairgrounds system to provide service and fire flows to the new exhibit building. The 2006 Preliminary Engineering Report (PER), prepared by Stahly Engineering, recommended placing this connection

along Reed Avenue. However, based on a desire to minimize impacts to the wetlands adjacent to the Fairgrounds pond and within the northwest corner of the Woodlawn subdivision, this connection was moved to Silsbee Avenue. This work will require the installation of fire hydrants and approximately 4,600 feet of 12-inch and 8-inch PVC water main.

- Woodlawn Park Addition – Install a new water distribution system within the Woodlawn area north of Custer Avenue and west of Green Meadow Drive. This system will be connected to the City of Helena's water distribution system. This work will require the installation of 14 fire hydrants and approximately 7,200 feet of 8-inch water main. Work within the subdivision will also include installing approximately 2,100 feet of  $\frac{3}{4}$ " – 1" water line for 62 water services. Approximately 40 of these services will be connected to the new system.
- AGC Training Facility - Connect the AGC facility to the existing City water main that services the Fairgrounds. This will require the extension of the City water main along Custer Avenue. This work will require the installation of approximately 600 feet of 8-inch PVC water main.

The work will include the restoration of all disturbed areas including open fields, wetlands, roadways, and alleyways. All required construction permits will be obtained prior to the start of construction. The proposed water system improvements can be seen in Appendix A.

## **2. Describe the project site and surrounding area(s), including existing site use and environmental conditions.**

The planning area encompasses the Lewis and Clark Fairgrounds (Fairgrounds), the Woodlawn Park Addition (Woodlawn) east of the fairgrounds, and the laborer's AGC Apprenticeship Training Facility (AGC Facility) property to the west. The contiguous study areas are located adjacent to Helena City limits, on its north side. The boundaries include Custer Avenue to the south, Green Meadow Drive to the east and Racetrack Meadows Subdivision to the north and west.

The Woodlawn Park Addition is bounded by the Fairgrounds to the west, Silsbee Avenue to the north, Green Meadow Drive to the east, and Custer Avenue to the south. The Fairgrounds and Woodlawn occupy the majority of the S  $\frac{1}{2}$  Section 13 T10N R4W and the AGC Facility is located in the SW  $\frac{1}{4}$  SW  $\frac{1}{4}$  Section 14 T10N R4W.

The Fairgrounds is a large facility used for major community events including fairs, concerts, rodeos and an occasional circus. Water is currently provided by the City of Helena through several 8-inch and smaller mains. A new exhibit building is currently under construction that will be supplied with both domestic water and fire protection through this project.

Woodlawn is a mixed-use residential/commercial area that includes about 51 different ownerships. Water is provided by individual wells with some of the wells measuring high in nitrates. No fire protection is provided.

### **Environmental Conditions:**

- Soils - Much of the soil within the study area has been disturbed or imported. This is especially true within the Fairgrounds where wetlands were filled beginning in the 1870's (WCP 2001). The Natural Resource and Conservation Service soil survey (NRCS 1995)

information indicates that there are three complexes (two or more soils) having six soil types. The majority of the study area is covered by the Meadowcreek – Fairway soil complex. These soils are composed of silt and sandy loams in the first 3 to 4 feet and gravel afterwards. Suitability for drainfields is very poor due to wetness and poor filtration.

The east half of the Woodlawn Park Addition is mapped as the Musselshell – Crago Complex. The soil texture is gravelly, containing a loamy mixture of sand and clay. Drainfield suitability is moderate due to slow percolation.

The Lewis and Clark County Water Quality Protection District prepared a report titled “Total Maximum Daily Load Development (TMDL) and Assessment of Wetlands treatment of Stormwater Runoff for the city of Helena, Montana” (dated October 29, 1999). This report includes analysis of soil samples collected from wetlands south of Custer Avenue and East of Henderson Street. Two locations were sampled at two different times. The soil sample results show small amounts of metals and trace amounts of pentachlorophenol (PCP) and picloram present within the soil at those two locations. The possibility of these contaminants being released to surface and groundwater during construction has been raised. Though neither soil sample was collected from areas directly impacted by the water or wastewater utility work, the data was examined and it was determined that due to the reported concentrations of contaminants, relative scale of the project, duration of disturbance, and the general soil and water conditions and chemistry, the potential of contaminant mobilization and transportation within the surface or groundwater is extremely unlikely.

- Groundwater– shallow groundwater underlies the project area. Water levels are less than 10 feet below ground surface (bgs) in the project area. The presence of springs indicates groundwater discharge zones and shallow groundwater. Recharge to the groundwater is primarily from the mountains to the south and west. Fluctuations in groundwater levels are either by natural causes or land draining.

In general, the shallow groundwater flow direction in the project area is toward the east-northeast with a groundwater gradient of approximately 0.008 feet/foot. Hydraulic conductivity was estimated to be approximately 200 ft/day in the deeper water-yielding zones and 5.3 ft/day in the shallow water-yielding zones.

A system of tile drains underlies the Fairgrounds directing water below and away from the Fairgrounds. The impact from these tile drains potentially changes the baseflow to Tenmile Creek. The tiles also alter the water-holding capacity of surface areas, as well as runoff rate. More efficient runoff developed by drainage systems can result in a decrease in recharge to groundwater. This tile drain system is partly responsible for changing the hydrology of the project area.

One point source area for past contamination to the shallow groundwater system was the Montana Department of Transportation (MDT) maintenance facility, located immediately south and adjacent to the Fairgrounds property. Total petroleum hydrocarbon (TPH) contamination had been reported in groundwater samples collected from monitoring wells at the facility and surrounding wells.

The presence of contaminants including heavy metals, organics and nitrates is well documented in the groundwater under the project area. This condition is a key driver behind the removal of septic systems from the Woodlawn area and the elimination of private wells using the local groundwater as their primary source of drinking water.

- Surface Water – Tenmile Creek is the principal drainage in the vicinity of the Fairgrounds project area. Two springs are known to surface in the project area. The Bald Butte Fault Zone extends along the southern Helena Valley margin and passes just south of the Fairgrounds. The trace of the fault passes near the point where both Crystal Spring and Home of Peace Cemetery Spring surface, potentially contributing to an upward vertical groundwater flow component in the area.

Crystal Spring surfaces west of the Fairgrounds in the vicinity of the railroad tracks. Spring water flows eastward under the Fairgrounds (likely into the tile drain system), resurfacing to the east. Numerous water rights are filed on Crystal Spring and listed in the Department of Natural Resources and Conservation database. A second spring located adjacent to the Home of Peace Cemetery, just south of the Fairgrounds and Custer Avenue, discharges to the surface and contributes water to the Custer Avenue wetlands.

There has been some concern expressed by the public that the installation of water and sewer lines in and around the wetland area could cause surface water to more rapidly drain from the area causing a negative impact to the area wetlands. A review of the soils, topography, lithology, and general pipe installation methods and compaction practices indicate no significant impact to the flow of surface water, groundwater or the resulting quality of the wetlands would be caused by either the proposed water project or the current wastewater project. Pipe installation methods will include the installation of several bedding blocks in key locations. Bedding blocks are 10-foot long bedding replacement areas where standard bedding material is replaced with relatively impervious native material to prevent the bedding from transporting water.

- Vegetation - The study area contains a variety of vegetation. The Fairgrounds and residential areas contain predominately Kentucky bluegrass (*Poa pratensis*). Open pasturelands contain smooth brome (*Bromus inermis*), slender wheatgrass (*Agropyron trachycaulum*), timothy (*Phleum pratensis*), Kentucky bluegrass, as well as others. Willows (*Salix* species) and Russian olive (*Elaeagnus angustifolia*) are the dominant shrub/tree and are present especially around wetter areas. Wetland herbaceous vegetation includes Kentucky bluegrass, sedges (*Carex* species) and rushes (*Juncus* species). Wetter areas contain cattails (*Typhus latifolia*) and reed canary grass (*Phalaris arundinacea*).

The vegetation within the project wetlands is diverse and has been a focal point of mitigation plans associated with this water distribution project and with the preceding wastewater collection project. The diversity of the plant species within the affected wetlands area was documented during a site visit by Patrick Plantenberg on July 25, 2007. Patrick Plantenberg is a reclamation specialist with the Montana Department of Environmental Quality but performed the site visit and written comments as a private citizen. His written comments are part of the public record associated with the Fairgrounds wastewater project. Plantenberg's written comments include a list of 52 plant species identified during his one-hour site visit. This list can be seen in Appendix B. The list documents that 27 of the 52 identified species (or 52%) are introduced plants or noxious weeds. The Plantenberg report also states "the native vegetation is being compromised by introduced species such as Russian olive, buckthorn, canary reedgrass, several noxious weeds, etc."

The Montana Natural Heritage Program (MNHP) executed a search of their database with regard to species of concern. Three vascular plant species were identified in the vicinity of the project area, namely: The Small Yellow Lady's-slipper, the Wedge-leaved Saltbrush,

and the lesser Rushy Miklvetch. No documentation of the presence of these plants within the project area was found; however, due to the nature of the utility work and the small scale and duration of the project, no significant impact to vegetation is anticipated.

A copy of the proposed Wetlands Mitigation Plan Summary is included in Appendix B and details the plant species proposed for reclaiming disturbed areas.

- Wetlands – Within the study area, wetland areas have been significantly reduced through filling. Wetland filling began in 1870 with the construction of the horserace track. The construction of the two railroad lines in the late 1800's resulted in realignment of surface and subsurface watercourses in the project area (WCP 2001). In addition, development throughout the southwestern portion of the Helena Valley adjacent to stream channels and wetland corridors has also contributed to changes in the wetlands regime.

Two inventories have been carried out in the study area. The first inventory was completed by the U.S. Fish & Wildlife Service (date unknown but thought to be in the 1980's) as part of the National Wetland Inventory (NWI). The second was completed by the Wetlands Community Partnership (1998-2001) as part of a survey that covered the Helena Valley.

The NWI data indicate wetland areas as follows:

- Shrub types -adjacent to the AGC Facility and in the southwest corner of the Fairgrounds,
- Open water pond – east of the Fairground entrance, and
- Emergent marsh/wet meadow/slough – east of the racetrack and associated with the outflow from the drainage tiles and the open water pond.

The results of the Community Partnership indicate a substantially greater area of wetlands than does the NWI. Outside of the east half of the Woodlawn Park Addition, the results of the Wetland Community Partnership indicate that the entire area is presently a wetland or was prior to filling and draining.

Both surveys rely on only one of the indicators – hydrology, vegetation, or soils. The U.S. Army Corps of Engineers, the agency that oversees wetland impacts and permits, requires that all three indicators be present before an area is classified as a wetland (Environmental Laboratory 1987).

The design of the water system has attempted to minimize impacts to the wetland areas while still providing water service to all lots within the Woodlawn/Dunbar area. This required modifying the initial pipe alignment seen in the PER and requesting permission from the City of Helena to allow the installation of one dead-end main. The water project will include the installation of approximately 630 feet of water main within the project wetland area (see Appendix A). The proper permits will be obtained prior to starting construction.

- Wildlife – Fauna of the area consists of typical mammalian species found in the intermountain west, including mule deer, whitetail deer, fox, rabbit, skunk, rodents and others. Common bird species include the black-billed magpie, American robin, Canadian goose, osprey, blackbird, sparrow, warbler, common waterfowl, other raptors, and others. Wetlands within the project area provide habitat for a wide range of birds. The Last Chance Audubon and Montana Audubon Societies have created a "Fairgrounds Pond Bird List". This list of 102 potential bird species has been included in Appendix B for general reference.

As part of the preparation for writing the 2006 Preliminary Engineering Report letters were sent to the U.S. Fish and Wildlife Service and the Montana Fish Wildlife and Parks requesting comment on the project. They were provided with the project description as presented in the PER. A letter returned from USFWS authored by R. Mark Wilson stated, "Given the scope and nature of the proposal, we do not anticipate any significant project-related adverse impacts to fish, wildlife or important habitats under the purview and jurisdiction of the Service." No written response was returned from FWP. However, a verbal response from Steve Dalby was that if a SPA 124 Permit is issued, they approve the project. That permit has been applied for.

The Montana Natural Heritage Program (MNHP) executed a search of their database with regard to species of concern. Four vertebrate animal species were identified in the vicinity of the project area, namely: The Gray Wolf, Black-Tailed Prairie Dog, Brewer's Sparrow, and Lewis's Woodpecker. The general occupied habitat areas for the Gray Wolf and the Black-Tailed Prairie Dog do not include the project area and no negative impact is expected. The two bird species are not shown on the Audubon list but due to the nature of the utility work and the small scale and duration of the project, no significant impact to bird species is anticipated.

Aquatic species in the Fairgrounds pond are not expected to be negatively impacted by the project. No significant change in water flow into or out of the pond is anticipated.

### **3. Describe the growth areas and population trends.**

#### **Fairgrounds**

Many years of planning have resulted in the passage of a Mill Levy in 2004 that will provide partial financing for expansion of the Fairgrounds to provide new economic opportunities for the Helena Community. Plans for that expansion, as envisioned by the Fair Commission, include improvements to infrastructure, a new 2500 seat grandstand, an exhibit hall, and rehabilitation of the existing multi-purpose building. It is anticipated that the facility will incorporate plans that have been set forth by previous studies.

The Lewis and Clark Fairgrounds Long Range Planning Committee (LRPC 1999) defined a long-term goal for the facility to become self supporting. In the document 2000-Plus, the Committee stated that "the success of the grounds must not be based on standard tradition and/or for special interest groups, but on economics and utilization of the property... In the future it will not be enough to play host to two or three major events each year and expect them to pay for the operation of the facility and to ensure its continued use."

The Fairground's Master Plan (Bullock, Smith & Partners 2002) called for improvement of the current facility. Although it is expected that these improvements would result in greater annual use of the Fairgrounds, estimated increased water and sewer demand would be dependent upon what kinds and frequency of uses develop. The recommended additions/changes from that study are as follows:

- Remodel existing multipurpose building to include new bathrooms, concession areas, and concrete floor,
- Construct new grandstand,
- Construct a larger exhibit building adjacent to the grandstand,
- Construct a new dirt floor "arena" building,
- Construct a livestock pavilion,
- Investigate the need for a sports arena complex,

- Upgraded campground facilities including additional spaces, restroom and shower facilities, and water services for each pad.

### **Woodlawn Park Addition**

The Woodlawn Park Addition has a limited growth potential due to high groundwater. Presently, there are five different ownerships that are vacant or underutilized that could be developed as residences or businesses. Under conditions of public water and sewer mains, future development on these parcels could result in an estimated additional 18 facilities.

### **AGC Facility**

The use of the AGC Facility is dependent upon demand for laborers within the workforce, as well as the programs offered at the facility. Demand should remain relatively constant, barring any drastic long-term changes within the construction industry. The AGC has plans for their facility to include a barn type building to enable an expansion in their curriculum. The expansion would increase the number of individuals served by the facility and the duration of their stay.

## **4. Describe the benefits and purpose of the proposed Action.**

Public health issues regarding water quality are the driving factors in choosing the action alternatives for the Woodlawn Park Addition and the AGC Training Facility. The proposed water project also improves fire protection throughout the area. Likewise, the Fairgrounds benefits from action alternatives because those alternatives improve the water distribution system and allow the facility to expand the services they can provide to the community.

Nitrate levels have been a source of concern within the study area. Water samples taken from wells within the study area indicate the presence of nitrates in many of the wells over a range of years. Septic systems installed prior to the beginning of the permitting program in 1973 could be the source. The state has required the use of a nitrate filter on the public water system at the Green Meadow Market. This appears to have helped with the problem and the State has gone from requiring quarterly to requiring annual water sampling (Rule 2002).

Nitrate samples collected from Fairgrounds wells in May 1997, November 1997 and June 1998 averaged 6 mg/l. Data taken from nine wells in the Woodlawn Park Addition in May 1989 (Briar and Madison 1992) show dissolved nitrate levels of 2.8 to 13 mg/l. Lewis and Clark County (2002) places the nitrate concentration in groundwater in the area at 3.04 to 9.93 mg/l.

Expanding the City of Helena's water distribution system to the Woodlawn and AGC areas helps protect public health by eliminating the use of private water supply wells that are susceptible to contamination. The improvement or expansion of the water system within the project area also provides a significant increase in fire flows, thus improving public safety.

## **5. Describe all sources of project funding:**

Estimated cost of the water project, including administrative, financial, engineering and construction costs, is \$1,631,341. Lewis and Clark County has received a \$100,000 grant from the state's Renewable Resource Grant and Loan program (RRGL), a \$596,388 Treasure State Endowment Program grant (TSEP), a \$254,097 Community Development Block Grant (CDBG), a \$336,256 mill levy, and a commitment for private funds of \$600. The district will take out a total of \$344,000 in Drinking Water State Revolving Fund loans at 2.75-3.75% for 20 years to complete the water system upgrade project funding package. The water system upgrade project will result in an estimated average monthly residential user rate of \$51.65.

**6. Describe any project plans or studies that are relevant to the project.**

An Infrastructure Study Preliminary Engineering Report was prepared by Stahly Engineering & Associates in April 2004. This document was updated in April 2006 with an emphasis on the needs of the water system. This document is titled "Lewis and Clark Fairgrounds/Dunbar Area Water System Upgrade Preliminary Engineering Report" and was submitted with the grant applications to various funding agencies.

Need for project was originally identified in the *"Inventory of On-Site Wastewater Treatment Systems - Lewis and Clark County, Montana"* written by the Lewis and Clark City-County Health Department, Environmental Health Division in April 2002.

**7. Proposed implementation schedule.**

Submit Design Report, Plans and Specifications	July 2007
Bidding Process	October 2007
Construction start	November 2007 - June 2008
Close out Certification	July 2008

**8. Compliance with any applicable local plans, ordinances or regulations.**

Project is in compliance.

	Yes	No	Not Applicable
Local Comprehensive (Growth Management) Plans including housing, land use and public facilities elements	[ x ]	[ ]	[ ]
Local zoning ordinances or land use regulations, such as permit systems or soil conservation district requirements	[ x ]	[ ]	[ ]

**9. Evaluation of impact, including cumulative and secondary impacts, on the Physical Environment:**

Please complete the following checklist. Attach narrative containing more detailed analysis of topics and impacts that are potentially significant.

**Key Letter:** **N** - No Impact/Not Applicable; **B** - Potentially Beneficial; **A** - Potentially Adverse; **P** - Approval/Permits Required; **M** - Mitigation Required

KEY	Impact Categories-- <b>PHYSICAL ENVIRONMENT</b>	<b>Source of Documentation</b> Note date of each contact or page reference. Attach additional material as applicable. Where appropriate, please fully explain in attached materials.
<u>P/M</u>	Soil Suitability, Topographic and/or Geologic Constraints	There are no known limiting geologic or geotechnical constraints. However, soils contain a high water table and local wetlands are present. Both 404, SPA 124 and general storm water permits will be required. These permits will require best management practices and mitigation to ensure protection of the soils and topography.
	HUD Environmental Criteria--24 CFR Part 51:	
<u>N</u>	51(b) Noise--Suitable Separation Between Housing & Other Noise Sensitive Activities & Major Noise Sources (Aircraft, Highways & Railroads) <sup>8 *</sup>	An increase in noise associated with construction equipment is expected. This increase will be minor and temporary, occurring only during construction and during normal working hours.
<u>N</u>	51(c) Hazardous Facilities--Acceptable Separation Distance from Explosive and Flammable Hazards (Chemical/ Petrochemical Storage Tanks & Facilities--ex., Natural Gas Storage Facilities & Propane Storage Tanks) <sup>7 *</sup>	No hazardous facilities have been identified within the project area.
<u>N</u>	51(d) Airport Runway Clear Zones-- Avoidance of Incompatible Land Use in Airport Runway Clear Zones <sup>7 *</sup>	The district is not within an airport runway clear zone.
<u>N</u>	EPA Hazardous Waste Sites, or Other Hazards or Nuisances Not Covered Above	There are no known EPA hazardous waste sites or other known hazards or nuisances within the project area. The possibility of metals and trace amounts of PCP are expected to be of small concentrations and the potential of transport within surface or groundwater is unlikely.
<u>N</u>	Lead-based Paint <sup>13</sup>	No facilities known to contain lead-based paint will be demolished or modified as part of this project.
<u>N</u>	Asbestos <sup>14</sup>	No facilities known to contain asbestos will be demolished or modified as part of this project.
<u>N</u>	Effects of Project on Surrounding Air Quality or Any Effects of Existing Air Quality on Project <sup>1 *</sup>	Air quality impacts are expected to be minor and temporary, occurring only during construction. Dust abatement will be required of the construction contractor.
<u>B</u>	Groundwater Resources & Aquifer <sup>a 10 *</sup>	A public water system would reduce the demand on the

\* See index at end of form.

**Key Letter:** **N** - No Impact/Not Applicable; **B** - Potentially Beneficial; **A** - Potentially Adverse; **P** - Approval/Permits Required; **M** - Mitigation Required

<b>KEY</b>	<b>Impact Categories-- PHYSICAL ENVIRONMENT</b>	<b>Source of Documentation</b> Note date of each contact or page reference. Attach additional material as applicable. Where appropriate, please fully explain in attached materials.
		underlying aquifer and maintain or possibly increase water flows within the aquifer.
<b>B</b>	Surface Water/Water Quality, Quantity & Distribution <sup>10,*</sup>	Replacing local water supply wells with a system connected to the City of Helena's system could potentially increase the quantity of water in the local wetlands. The additional source water demand from the sources used by the Helena system will be insignificant in comparison to current flows.
<b>N</b>	Floodplains & Floodplain Management <sup>5 *</sup>	The project will have no impact to the floodplains present in the northwest corner of the project area or along Tenmile and Sevenmile Creeks to the west and north.
<b>P/M</b>	Wetlands Protection <sup>11 *</sup>	The project area includes wetlands (see Appendix A). The replacement of local water supply wells with a public water distribution system within the area could potentially reduce drawdown to the existing groundwater and improve the quality and seasonal sustainability of water reaching the wetland areas. Following construction, mitigation efforts will be required of the contractor for any disturbance created. A wetland permit (404) from the Corps of Engineers will be required and will address wetlands mitigation.
<b>N</b>	Agricultural Lands, Production, & Farmland Protection <sup>3*</sup>	Land use is residential and commercial; no agriculture lands will be affected by this project.
<b>P/M</b>	Vegetation & Wildlife Species & Habitats, Including Fish <sup>4*</sup>	Vegetation and wildlife would not be negatively impacted by this project. Both 404 and SPA 124 permits will be required. These permits will require best management practices and mitigation including the reseeding of all disturbed areas.
<b>N</b>	Unique, Endangered, Fragile, or Limited Environmental Resources, Including Endangered Species <sup>2*</sup>	No unique, endangered, fragile or limited environmental resources, including endangered species, will be significantly impacted by the project.
<b>N</b>	Unique Natural Features	No known unique natural features have been documented within the project are.
<b>N</b>	Access to and Quality of Recreational & Wilderness Activities, and Public Lands, Including Federally Designated Wild &	The project will not impede access to open spaces or public lands. The project will not decrease the quality of recreational activities and no federally designated wild

<sup>a</sup>Including Sole Source Aquifer. Contact DOC for further information regarding Missoula-area projects.

	Scenic Rivers <sup>12 *</sup>	and scenic rivers are located in or near the project area.
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**10. Evaluation of impact, including cumulative and secondary impacts, on the Human Population in the area to be affected by the proposed action:**

Please complete the following checklist. Attach narrative containing more detailed analysis of topics and impacts that are potentially significant.

**Key Letter:** **N** - No Impact/Not Applicable; **B** - Potentially Beneficial; **A** - Potentially Adverse; **P** - Approval/Permits Required; **M** - Mitigation Required

KEY	Impact Categories--  HUMAN POPULATION	Source of Documentation Note date of each contact or page reference. Attach additional material as applicable. Where appropriate, please fully explain in attached materials.
<u>N</u>	Visual Quality--Coherence, Diversity, Compatible Use, and Scale Aesthetics	Additional development of the land within the district may occur as a result of the project, but this development is expected to be compatible with existing use.
<u>N</u>	Historic Properties, Cultural, and Archaeological Resources <sup>6 *</sup>	No historic properties or cultural or archaeological resources have been identified by SHPO. However, the Fairgrounds Racetrack is considered an object of historical value and the contract specifications detail the requirements to maintain its integrity at the two points where the water main crosses the track. In the event that historic properties are found during construction a site investigation will be performed.
<u>B</u>	Changes in Demographic (Population) Characteristics	Construction of the project may increase population density within the Woodlawn area. The addition of residences/businesses adjacent to Helena City limits is compatible with the Lewis and Clark County Comprehensive Plan (2000).
<u>N</u>	Environmental Justice <sup>13 *</sup>	No environmental justice issues have been identified during project development.
<u>N</u>	General Housing Conditions--Quality & Quantity	The addition of a public water supply system to the Woodlawn area could lead to additional residences or businesses in the few vacant areas. It is also possible that housing quality would increase over time.
<u>N</u>	Displacement or Relocating of Businesses or Residents	The project will not cause the displacement or relocation of businesses or residents.
<u>B</u>	Human Health	The replacement of local water supply wells with a public distribution system connected to the City of Helena is expected to help protect human health as the local wells are highly susceptible to contamination.
<u>B</u>	Local Employment & Income Patterns--	The potential growth of residences and businesses

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<b>KEY</b>	<b>Impact Categories--</b>	<b>Source of Documentation</b>
	<b>HUMAN POPULATION</b>	<b>Note date of each contact or page reference. Attach additional material as applicable. Where appropriate, please fully explain in attached materials.</b>
	Quantity and Distribution of Employment	within the project area could increase the local employment opportunities.
<b>B</b>	Local and State Tax Base & Revenues	The City of Helena's tax base will increase as the project area is annexed into the city.
<b>B</b>	Educational Facilities	The project will improve the water supply to the AGC Training facility and could facilitate growth of this facility.
<b>B</b>	Commercial and Industrial Facilities, Production & Activity	The addition of a public water supply system to the project area may lead to possible commercial development.
<b>N</b>	Health Care	No impacts to health care are anticipated.
<b>N</b>	Social Services	Increased needs for social or governmental services are not anticipated.
<b>N</b>	Social Structures & Mores (Standards of Social Conduct/Social Conventions)	No impacts are envisioned.
<b>N</b>	Land Use Compatibility	Although residential and commercial density may increase slightly as a result of the project, land use in the overall project area is expected to remain the same. City of Helena zoning ordinances may affect some land use once annexation takes place.
<b>N</b>	Energy Consumption	Long-term energy use is not expected to change significantly.
<b>N</b>	Solid Waste Disposal <sup>9*</sup>	No impacts are anticipated.
<b>N</b>	Waste Water--Sewage System	The water project will have little to no impact on the wastewater or sewage systems. Note that the project area is scheduled for improvements to the Fairgrounds WW system and the expansion of the Helena WW system to the AGC facility and Woodlawn area. The Helena system has ample capacity for this change.

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<b>KEY</b>	<b>Impact Categories-- HUMAN POPULATION</b>	<b>Source of Documentation</b> Note date of each contact or page reference. Attach additional material as applicable. Where appropriate, please fully explain in attached materials.
<u><b>B</b></u>	Storm Water	The project would help direct storm water improving the overall storm water management.
<u><b>N</b></u>	Community Water Supply	The city water system has the capacity to serve the project area.
<u><b>N</b></u>	Public Safety: Police	No impacts are anticipated.
<u><b>B</b></u>	Fire	The addition of fire hydrants within the project area will improve the fire protection.
<u><b>N</b></u>	Emergency Medical	No impacts are anticipated.
<u><b>N</b></u>	Parks, Playgrounds, & Open Space	No significant impacts are anticipated.
<u><b>B</b></u>	Cultural Facilities, Cultural Uniqueness, & Diversity	An improved public water system will allow for future expansion/development of the Fairgrounds area.
<u><b>N</b></u>	Transportation--Air, Rail & Auto (Including Local Traffic)	No impacts are anticipated.
<u><b>N</b></u>	Consistency with Other State Statutes or Local Ordinances, Resolutions, or Plans ( <i>to be added by local community</i> )	The project is consistent with local planning efforts.

**11. Describe and analyze reasonable alternatives to the proposed activity whenever alternatives are reasonably available and prudent to consider, and discuss how the alternatives could be implemented, if applicable.**

The 2006 Water System Upgrade PER considered alternatives for the three areas that comprise the Lewis and Clark Fairgrounds/Dunbar Area: the Fairgrounds, the Woodlawn Park Addition and the AGC Facility. The alternatives for the Fairgrounds are driven by the need to deliver adequate fire-flows and provide additional services throughout. The alternatives proposed for the Woodlawn Park Addition and the AGC Facility are driven by the need to guarantee water quality standards, improve fire flows and allow for growth. Each area carries a "No Action" Alternative.

The 2006 PER outlined alternatives by area served. Action alternatives for water improvements are mutually exclusive of each other and could be phased in based on availability of funds. The alternatives examined are as follows:

### **Fairgrounds Alternatives**

- No Action
- Action Alternative consisting of:
  - Green Meadow Loop
  - North Fairgrounds Loop

The Action Alternative includes the Green Meadow Loop and the North Fairgrounds Loop. These Loops could be built exclusive of each other, however without the Green Meadow Loop adequate fire flows would be lacking throughout the Fairgrounds Area. The Green Meadow Loop has an external connection with the City water system. This loop also benefits the Woodlawn Park Addition, since it also services a portion of that area. The North Fairgrounds Loop is internally connected to the existing Fairgrounds system.

The No Action Alternative would result in the status quo for the Fairgrounds water supply. Development of the facilities infrastructure would be limited as a result of water supplies. City fire flow requirements would continue to be deficient as well.

The Green Meadow Loop would serve the Fairgrounds with a 12-inch water line connected to the existing water system on the eastside of the Fairgrounds. The connection would pass through the Woodlawn Park Addition to the Northgate Meadows Development water main on the east side of Green Meadow Drive and would be routed along Silsbee Street

The North Fairgrounds Loop would service the, North Barn Area, new Exhibit Building and Rodeo Grounds. The connection to the existing 8-inch water main would be west of the Administration Building.

### **Alternatives Considered But Not Suitable for Further Discussion**

The existing water lines servicing the Fairgrounds are of small diameter and not adequate to provide fire flows. In addition, the wells lack adequate fire protection capacities. Therefore, alternatives using the existing wells and lines are not suitable for further consideration.

Phase 3 of the Lewis and Clark County Fair Infrastructure Plan (McKenna 1997) called for a water main to be routed through Woodlawn Park Addition and connect to the Custer Avenue water main. This Plan was created prior to the approval of the Northgate Meadows Development. A route to the Northgate Meadows main would be shorter and less costly than that originally proposed.

### **Woodlawn Park Addition Alternatives**

- No Action
- Woodlawn Distribution System

The No Action Alternative would result in continued use of well water for domestic and commercial use. Septic system failures that may result if residents in the area do not convert their system to the newly constructed City sewer connection would be expected to pose a threat by potentially contaminating domestic water supplies. Fire protection (i.e. flows and the addition of hydrants) would not be

improved.

The Woodlawn Distribution Alternative would require the installation of water mains within the Woodlawn Park Addition streets and along Custer Avenue and Green Meadow Drive. These would connect to the City mains along Green Meadow Drive and Custer Avenue

#### Alternatives Considered but Not Suitable for Further Discussion

Woodlawn Park Addition would have the potential to connect to City water without the Fairgrounds connection. The connection would occur along Green Meadow Drive and Custer Avenue. In the interest of community planning, it was determined the Woodlawn Distribution System would benefit more users. Therefore, the Green Meadow and Custer connections only option will not be considered.

#### **AGC Facility Alternatives**

- No Action
- Maintenance Site Connection

Under the No Action Alternative, the AGC Facility would continue to use well water for domestic purposes. Student capacity would continue to be limited. The threat of nitrates caused by Drainfield failure would continue.

Under the Maintenance Site Connection Alternative, the AGC Facility would be connected to the existing City water main that services the Fairgrounds via Ryan Fields. Drinking water standards would be sustained and increased use of the facility could occur.

#### Alternatives Considered but Not Suitable for Further Discussion

Several alternative routings to connect the AGC Facility to the Fairgrounds water main were initially investigated. However, cost or environmental considerations eliminated further discussion of these alternatives.

#### **Selection of Preferred Alternative**

The 2006 PER selected alternatives based on several criteria, both monetary and non-monetary. This section presented an objective methodology for comparing these factors in selecting an alternative for implementation. The alternative ranking criteria included:

- Capital Cost – Lower up-front capital costs would yield lower community debt and thus, a more favorable project.
- O&M Complexity – Alternatives that are simple to maintain and operate are more attractive in terms of dependability and usability.
- Cost Effectiveness – Cost effectiveness was evaluated using net present worth of the improvements. This considers capital cost plus operation and maintenance costs over a 20 year period.
- Environmental Feasibility – Alternatives that minimize negative environmental impacts (short term and long term) are more favorable.
- Public Health – A higher degree of public health benefit results in more favorable rating.
- Compatibility with Community Goals – Alternatives that are compatible with local land use and anticipated development patterns are more favorable. This compatibility score also considers surrounding infrastructure and the goals of the owners of property and facilities within the study area.

- Public Acceptance – Alternatives that more closely represent public views and attitudes are more favorable and were assigned a lower numeric score. This criterion will be refined as the projects move forward.
- Regulatory Compliance – Favorable alternatives rectify current regulatory limit or guideline issues.

### **Recommended Alternatives**

Based on the criteria listed above the 2006 PER made the following recommendations for improving the water distribution system within the Fairgrounds/Dunbar area.

#### **Fairgrounds**

The alternatives for the improvements at the Fairgrounds are no-action vs. action. The Action Alternative consists of the Green Meadow Loop and the North Fairgrounds Loop. Since the No Action Alternative doesn't provide for the planned future expansion and development of the property and doesn't provide for adequate fire flows to the facilities that currently exist, this alternate is not recommended.

The Green Meadow Loop, routed along Silsbee Street and extending into the Fairgrounds complex, is necessary to provide proper fire flows to the buildings within the Fairgrounds complex. It is emphasized that this loop will also benefit the Woodlawn Park Addition. The North Fairgrounds Loop will benefit further growth and development in the northern part of the complex. The North Fairgrounds Loop encircles the new exhibit building and its connection point to the existing system is between two large existing structures enhancing fire protection. Also, a short dead end main will be routed to the existing barns on the north side of the horse race track to provide fire protection to these structures. Therefore, the Action Alternative is recommended.

#### **Woodlawn Park Addition**

The alternatives for improvements in the Woodlawn Park Addition can be summarized as no-action vs. action, with the action alternative consisting of installation of water lines within the subdivision. Since the no-action alternative leaves all of the existing wells in place and doesn't correct problems that exist which acts as a deterrent to further development on some of the parcels within the area, the no-action alternative is not recommended.

The action alternative would place waterlines throughout the area, routed along platted streets, providing City water to all establishments. These lines would be connected to Green Meadow Loop routed along Silsbee Street, referred to in the Fairgrounds discussions. To avoid wetlands the water main originally planned along Reed Street was realigned to Silsbee Street. Water is provided to the residences and properties along Reed Street via a short section of deadend main extending north from Willow Street to the alley between Willow Street and Reed Street. Services will be extended down the alley.

Although specific modeling was not completed, flows will significantly exceed the required fire flow of 2,250 gpm. The installation of fire hydrants will enhance the response time and fire fighting capability. Better fire protection will probably lower building insurance costs to most owners. Residences will also be provided water that is not high in nitrates. Therefore, the Woodlawn Distribution System is recommended.

#### **Laborers AGC Facility**

The alternatives for this facility are to continue use of an on-site water well or to connect to the City water system at the Maintenance Site Connection. The managers of the AGC Facility

prefer to connect to the City water system since this will improve dependability. Therefore, the Maintenance Site Connection is the recommended alternative.

**12. Where applicable, list and evaluate mitigation actions, stipulations, and other controls, which will be enforced by the local government or another governmental agency.**

City zoning, land use, police and fire protection, and city ordinances will all be enforced. All mitigation requirements listed in permits will be fulfilled.

The City of Helena has received petitions from more than 60% of the residents of Woodlawn who agreed to waive their right to protest annexation. The City plans to annex the area once the Water Project has been completed.

Areas of wetland disturbance will be reclaimed and seeded with a wetland seed mix consisting of reedtop, beaked sedge, and Baltic rush. In addition, a subsequent project to plant woody vegetation will be completed. This subsequent project will plant trees and shrubs to mitigate both the water project and the related but separate sewer project that will serve the same area. The species of trees and shrubs selected for planting are Bebb's Willow, Chokecherry and Quaking Aspen. All reclamation will be in accordance with the 404 permit from the U.S. Army Corps of Engineers and a SPA 124 permit from the Department of Fish, Wildlife and Parks that will be obtained for this project.

**13. Address the cumulative impacts from the project including a discussion of past, present and future conditions.**

Cumulative effects are caused by the aggregate of past, present, and reasonably foreseeable future actions. The geographic extent of this analysis is limited to those actions, both federal and non-federal, occurring within an approximate two-mile radius of this project. This geographic region includes all of the Fairgrounds, Woodlawn Subdivision and some surrounding public and private property that falls within the city limits of Helena and Lewis and Clark County. In terms of direct incremental cumulative effects, the implementation of the proposed water and wastewater system improvements projects are not considered significant.

The installation of the water and sewer mains will require the removal of vegetation (including some trees and shrubs) and existing topsoil and may increase the potential for soil erosion and runoff proximal to the construction site. However, the scale and relatively short duration of the project; it is unlikely that the main installation projects would contribute to cumulative impacts to surface or groundwater within this region. The increase in potential for soil erosion in disturbed areas during main installation would be addressed by revegetating all disturbed areas and by applying proper erosion control measures during construction. The work in the wetlands will require a 404 permit from the U.S. Army Corp of Engineers and a 124 permit from the Montana Fish, Wildlife and Parks Department. Mitigation efforts will be fully established during the permitting process.

**Reasonably Foreseeable Future Actions**

The City of Helena may annex all or a portion of the project area as this area will be served with City water and wastewater utilities. Approximately 52 Woodlawn area water and wastewater connections to the city will be included with this project. The City of Helena's water and wastewater systems have the current and future capacities to provide service to this area. The addition of water and sewer service to this area would increase the likelihood of future development within the project area; however there are only five undeveloped ownerships within the Woodlawn Subdivision. Likewise the improvement of existing water and wastewater systems within the Fairgrounds area will facilitate expansion of services and events held at the Fairgrounds.

The further development of this area is part of the planned growth as documented in city and county policies. The majority of water line installation will be done in existing road and alleyways and is not expected to significantly degrade environmental resources or ecosystems. However, the project includes the installation of water through wetland areas east of the Fairgrounds. Approximately 630 feet of water main will be installed through the wetland area (see Appendix A). The construction of additional roadways will not be required for the water project.

The water project will require both a 404 permit from the Army Corps of Engineers and 124 permits from the Montana FWP. These permits will detail the required wetlands mitigation. A proposed wetlands mitigation plan can be seen in Appendix B. The overall quality and integrity of these wetlands will remain substantially intact.

The expansion of City water and wastewater utilities could potentially lead to other areas being developed. This growth would likely occur in the area west of Green Meadow Drive and North of the Woodlawn area. This potential growth and growth in the Woodlawn and Fairgrounds system would increase traffic thus increasing air pollution and noise. The potential for soil erosion and runoff from future paved area could potentially impact surface water quality in the area. However, the projected growth over the next 20 years is not expected to cause cumulative effects beyond the capacity of the resources. Future NEPA analysis would be required for any discussion of cumulative impacts beyond this scope and time frame.

### **Present**

The project work site is within Lewis and Clark Fairgrounds property or within the streets and alleyways of the Woodlawn subdivision or Helena. A wastewater project is currently underway within the project area. The project will improve the wastewater system at the Fairgrounds and sewer the Woodlawn area and AGC facility. The project will connect the Woodlawn and AGC Facility to the City of Helena's wastewater system.

The wastewater work will require two gravel service roads to access two manholes within the wetland. Both roads are located in the corridor along the Fairgrounds east property boundary, east of the Fairgrounds pond and the vegetated area surrounding the pond. These roads will provide access for periodic cleaning and video inspection of the sewer mains. Use of the roads should not exceed more than once a year unless there is a specific maintenance problem or repair that requires attention. The road to the south manhole in this corridor is a 14-foot wide gravel surface and extends about 50-feet across the wetland. The road to the south is a gravel two track gravel road, with each track three foot wide. It extends roughly 200-foot across the wetland. These roads are the only permanent impact to the wetland.

The majority of the wastewater main installation is being done in existing road and alleyways and is not expected to significantly degrade environmental resources or ecosystems. However, the project includes the installation of sewer lines through wetland areas east of the Fairgrounds. Approximately 780-feet of sewer lines will be installed through the wetland area. About 300-feet of both the water and sewer main alignments will be installed parallel to one another with a horizontal separation of about 12-feet.

The wastewater project requires both a 404 permit from the Army Corps of Engineers and a 124 permit from the Montana FWP. These permits have been received and detail the required wetlands mitigation. The overall quality and integrity of these wetlands will remain substantially intact.

### **Past Actions**

Fairgrounds - The County owns the Lewis and Clark Fairgrounds. The Fairgrounds were initially constructed in the 1870's and in the course of the last 130 years have undergone continuous change and modification.

Since 1988, the facility has been served by City water via a 12-inch main running north from Brady Street. Prior to this time the Woolston well provided water to the Fairgrounds. Internal waterlines within the Fairgrounds facility are 8-inch PVC or smaller. Three fire hydrants are present on the Fairgrounds.

Additionally, there are two outlying wells. One is located in the "North Barn" area. A second well is located in the campground but is not used due to testing/monitoring requirements.

Woodlawn Park Addition - The Woodlawn Park Addition is served by an estimated 45 private wells. Twenty-nine wells serve residences, 13 wells are serving commercial establishments and 3 wells serve a residence/commercial combination. There is also one community well system that serves nine mobile home units.

Of the estimated 45 wells, 24 have information listed with the Ground-Water Information Center (GWIC 2002). Four of the 24 wells are second wells, drilled after the original wells had developed problems. The wells have an average depth (bgs) of 85 feet, average static water level of 29 feet, and an average yield of 25 gpm. Fire protection is not provided to the extent that city water mains and fire hydrants would provide.

AGC Facility - The AGC Facility land was purchased following the creation of the Racetrack Meadows Subdivision in 1978. The first buildings were moved onto site in 1979. The Facility has an office, dormitory and caretakers house which serve up to 5 individuals for half a year, up to 20 people for 3 months, and up to 30 people for several weeks per year (Laborers Program 2002).

The Facility is served by a public water supply well. Records show that the well was in place in 1973 (GWIC 2002). The well is 72 feet deep. Pumping water level is 50 feet bgs, static water level is at 4 feet bgs and yield is 20 gallons per minute (gpm).

Section 2 of this report reflects any past impacts associated with the Fairgrounds, Woodlawn Addition and ACG facility.

### **Cumulative Conclusion**

The immediate Fairgrounds/Woodlawn project area is experiencing little population growth while the surrounding city and county areas are experiencing moderate to high grow rates. The proposed water system improvements project and the wastewater improvements project currently under construction will have little to no affect on this overall growth rate and its associated cumulative impacts. Considering additional potential project cumulative impacts over a 20 year period for the project area there is no indication that resources, ecosystems or human communities will be significantly impacted or harmed.

Further development of this area and land surrounding it may include construction of additional roadways, residential areas and commercial facilities. This growth would increase traffic thus increasing air pollution and noise. The potential for soil erosion and runoff from paved area could potentially impact surface water quality in the area. However, future NEPA analysis would be required for any discussion of such growth as it is beyond the scope and time frame of this environmental assessment.

#### **14. Identify and discuss the public involvement associated with the project.**

Five public meetings were held to inform and get feedback from the area residents and other interested persons. An additional Early Public Notice meeting was held specifically regarding impacts to wetlands.

The first meeting was held February 4, 2003 at the Fairgrounds. This meeting was primarily an informational meeting to inform the public about the study and what potential outcomes might be. Notable feedback from the meeting included support for the projects. Attendees were particularly supportive of the opportunity for the projects to expand services and activities at the Fairgrounds and to alleviate public health concerns for water users. There was some resistance to annexation into the City of Helena for Woodlawn Park Addition.

The second public meeting was held August 20, 2003. A newsletter was developed to inform potential attendees of the meeting and progress being made toward completion of the PER. This second meeting presented interested persons with the selected alternatives and preliminary cost analysis for the water and wastewater improvements. City of Helena and Lewis and Clark County personnel attended the meeting to answer questions related to the study and talk about their plans for the area. The meeting was well attended by residents of the Woodlawn Park Addition. Questions were primarily related to future annexation into the City.

Cost of the project and funding strategies were also discussed. The residents were urged by City and County personnel to organize themselves as a community in order to make decisions and be successful at applying for funding for their water and wastewater infrastructure improvements.

The Fort Harrison Outfall wastewater alternative will require some acquisition of right-of-way. There are two property owners that could potentially be affected. One of those property owners has raised concern about that alternative because he is against further commercial and residential development between his property and the Woodlawn Park Addition boundary. Currently, that area is in zoning that requires 20-acre parcels. He is concerned that extending sewer services along the Fairgrounds property and connecting to the Fort Harrison Outfall will encourage other property owners to annex into the City of Helena in order to change the zoning requirements for their property. He has cited change to the agricultural land use and disturbance to wetlands in the area as his reason for protest. A meeting of the Technical Committee held August 28, 2003 confirmed that residents in that area already have the potential to annex into the City and hook into City services via the Fort Harrison Outfall and that this new line may only slightly ease the cost burden on doing so.

The Third Public Meeting was held March 30, 2004. The purpose of this meeting was to present a final funding strategy, particularly for the wastewater project. County and City officials attended the meeting to explain the RID process and answer questions that still remained regarding the project as a whole. General consensus at this meeting was that most residents of the Woodlawn area are in favor of creating an RID to generate funds to pay for the water and wastewater improvements recommended in this study. A director from the AGC board also gave his approval of the project. A petition was available for residents of Woodlawn to sign that confirmed their interest in going forward with the formation of a Rural Improvement District (RID) for the Woodlawn Park Addition. The petition was used by the County Commission as evidence of interest to create an RID and they passed a Resolution of Intent to create the RID August 18, 2005.

The Fourth Public Meeting, held June 29, 2005 was again primarily related to the wastewater project to update and clarify funding for the project, particularly the estimated cost of the RID assessment. The meeting also covered annexation to the City of Helena following construction of the new water system. City staff was available to answer questions and present information about issues such as water meter installation and other requirements of annexation.

A Fifth Public Meeting was held on March 15, 2006. City and County staff including the City Manager, Tim Burton, and the County Chief Executive Officer, Ron Alles, were in attendance. The status of the

wastewater project was presented and the proposed water improvements were discussed including a detail of the funding plan. Ron Alles asked for a show of hands of those in favor of pursuing grant funding for the water project and approximately three quarters of the individuals present were in favor. Ron informed the audience that if anyone had additional opposition to the applications they should contact the County before March 24, 2006.

A woman from the audience who was opposed to the project said she was opposed for two reasons: 1. She doesn't like the taste of the City's water and 2. She cannot afford to pay anything additional.

Finally, as required by CDBG in conjunction with a 30 day public notice/comment period on the project, an Early Public Notice Meeting was held to discuss impacts to the wetlands in the area. This meeting was held at the 4-H Building on August 27, 2007. A brief presentation of the Water Connection project and the impact the project would have on wetlands was presented by Laura Erikson, Lewis and Clark County Grants Coordinator and Jeff Larson, project manager from Stahly Engineering. The meeting included a description of the water project including visual presentation of the alignment for the system, constraints taken into account during design, and permitting requirements. The impacts to the wetlands were shown and the mitigation plan was discussed. An informal question and discussion period was held and finally the meeting ended with formal testimony being taken. Two oral comments were presented in favor of the water project. Comment sheets were distributed for anyone who wished to comment in writing. Three written comments were received by the County within the 30 day comment period.

Two of the three written comments came from the same person. Written comments raised concern about the EA written for the wastewater project and permits issued for the project. Additionally, there was disagreement about the mitigation plan.

Responses to written comments will be provided by Stahly Engineering.

#### **15. Identify any federal, state or local actions, regulations or permits associated with the project.**

All water mains will be designed to meet Montana DEQ requirements. Proper State regulatory review and approval of the project plans and specifications will be obtained. All applicable State permits will be acquired including, but not limited to, a Stormwater discharge permit and a construction-dewatering permit.

Due to the presence of live streams and wetland areas within the project area, permits under the Clean Water Act (Section 404) will need to be acquired through the U.S. Army Corps of Engineers. Also, a SPA 124 Permit may need to be obtained from the MFWP in compliance with the Stream Protection Act.

City of Helena water lines will be installed for all recommended alternatives. A formal agreement will be written between the City and the owner to provide for City services. Within that agreement, operational requirements will be defined. All operation and maintenance activities will be performed by City personnel. The capacity of Helena's water treatment and distribution system is sufficient to handle the current and future flows of the Lewis & Clark Fairgrounds and Woodlawn area including the moderate growth of this area.

#### **16. Provide a list of agencies consulted for input or comments regarding the project.**

The following agencies were contacted regarding the proposed construction of this project:

- A. The Montana Department of Fish, Wildlife and Parks was asked in a May 11, 2004, letter by the project consultant for comments on the proposed project. A follow-up email was

sent in June 2004 and the consultant spoke with an agency representative who had no issues regarding the project. An additional letter was sent specifically asking for comment on the water project on February 28, 2006 with no response from the agency other than assurance verbally that once the SPA 124 permit is received it will mean that FWP has no objection to the project.

- B. The U.S. Fish and Wildlife Service reviewed the project and a comment letter was received in June 2004. The letter states, "The Service reviewed the proposed project and determined that threatened bald eagles may be present as spring or fall migrants within or near the action area. Given the scope, location and nature of the proposed project, we do not anticipate any project related adverse impacts to listed species or any critical habitat. This concludes consultation and no further review under section 7 of the Endangered Species Act is necessary." An additional letter was sent specifically asking for comment on the water project on February 28, 2006 and the response to that further inquiry dated August 17, 2007 was "Given the scope and nature of the proposal, we do not anticipate nay significant project-related adverse impacts to fish, wildlife or important habitats under the purview and jurisdiction of the Service."
- C. The U.S. Army Corps of Engineers reviewed the project and a comment letter was received in June 2004. The letter said the Corps of Engineers is responsible for administering Section 404 of the Clean Water Act, which regulates the excavation or placement of dredged or fill material below the ordinary high water mark of the nation's rivers, streams, lakes or in wetlands. From the limited information provided, the Corps of Engineers could not determine whether a Section 404 permit would be required. An additional letter was sent specifically asking for comment on the water project on February 28, 2006 and the response to that further inquiry dated March 27, 2007 and it stated that "If any work is anticipated in a wetland or stream channel, a Section 404 permit is probably required." Note, an application for the permit has been submitted and will be received prior to starting construction.
- D. The Montana Historical Society's Historic Preservation Office reviewed the project a comment letter was received in April 2004. The letter states, "We feel that because the lines will be placed in previously disturbed ground there is low likelihood cultural properties will be impacted. We, therefore, feel that a recommendation for a cultural resource inventory is unwarranted at this time. However, should cultural materials be inadvertently discovered during this project we would ask that our office be contacted and the site investigated." A similar response was received following a letter of inquiry dated February 27, 2007. A follow up letter sent August 6, 2007 that included a proposed layout of the project and specific request for review of the racetrack crossing resulted in a response dated August 15, 2007: "we believe that archaeological monitoring of the excavation is not necessary for this project."
- E. The Montana Department of Natural Resource and Conservation reviewed the proposed project and indicated that they had not comments. They forwarded the request for comment to the DNRC Floodplain and Trust Lands Division.
- F. The Montana Department of Natural Resource and Conservation's Floodplain Section reviewed the proposed project and responded in a July 2004 letter. The letter states, "the proposed project will not have an adverse impact on any designated 100-year floodplain. In conclusion, this project would be in compliance with the Flood Disaster Protection Act of 1973, the NFIP and EO11988." A letter forwarded to the Floodplain

Program that was written February 28, 2007 was responded to: "we see no adverse impacts to the floodplain due to this project."

- G. The Montana Department of Environmental Quality Public Water Supply Section reviewed the proposed project and indicated that the Department would require review and approval of the extension of City services. Websites were provided detailing the requirements of project approval. Their response to inquiry in February 2007 was "the project will be subject to all applicable local, state and Federal regulations. In addition, there will be funding agency requirement including the need to perform an environmental assessment. May of these requirements are detailed in the *"Uniform Application for Montana Public Facility Projects."*

18. **Is the proposed project in compliance with all applicable Federal, State, and local laws and regulations?**

☒ Yes    ☐ No

**LEVEL OF CLEARANCE FINDING:**

Based on the foregoing environmental review, it is concluded that:

**[X] FINDING:** A request to the Montana Department of Commerce for release of funds for the within project **is not** an action significantly affecting the quality of the human environment, and no EIS is required. A Finding of No Significant Impact (FONSI) can be made.

OR

**[ ] FINDING:** A request to the Montana Department of Commerce for release of funds for the within project **is** an action significantly affecting the quality of the human environment, and an EIS is required.

Rationale for Recommendation: Through this EA, The Montana DEQ has verified that none of the adverse impacts of the Lewis and Clark County/Dunbar Area (Woodlawn subdivision) water system upgrade project are significant. Therefore, an environmental impact statement is not required. The environmental review was conducted in accordance with the Administrative Rules of Montana (ARM) 17.4.607 through 17.4.610.

Finding Executed by:

Name (Typewritten): Laura Erikson, Lewis and Clark County Grants Coordinator

Title: Environmental Certifying Officer

Signature:

Date:

## **INDEX OF APPLICABLE FEDERAL STATUTES AND REGULATIONS INCLUDED IN THE CHECKLIST**

### **1. Air Quality**

- a. Clean Air Act (42 U.S.C. 7401 et seq.) as amended; particularly section 17(c) and (d) (42 U.S.C. 7506(c) and (d)).
- b. Determining Conformity of Federal Actions to State or Federal Implementation Plans (Environmental Protection Agency-- 40 CFR parts 6, 51, and 93).

### **2. Endangered Species**

- a. The Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.) as amended; particularly section 7 (16 U.S.C. 1536).

### **3. Farmlands**

- a. Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.) particularly sections 1540(b) and 1541 (7 U.S.C. 4201(b) and 4202).
- b. Farmland Protection Policy (U.S. Department of Agriculture 7 CFR Part 658).

### **4. Fish and Wildlife**

- b. Fish and Wildlife Coordination Act (16 U.S.C. 661-666c).

### **5. Floodplain**

- a. Executive Order 11988, Floodplain Management, May 24 1977 (42 FR 26951, 3 CFR, 1977 Comp., as interpreted in HUD regulations at 24 CFR Part 55).
- b. Flood Disaster Protection Act of 1973, as amended (42 U.S.C. 4001-4128).
- c. National Flood Insurance Program (44 CFR 59-79).

### **6. Historic Properties**

- a. The National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 et seq.), particularly sections 106 and 110 (16 U.S.C. 470 and 470h-2), except as provided in §58.17 for Section 17 projects.
- b. Executive Order 11593 - Protection and Enhancement of the Cultural Environment, May 13, 1971 (36 FR 8921), 3 CFR 1971-1975 Comp., particularly section 2(c).
- c. 36 CFR Part 800 with respect to HUD programs other than Urban Development Grants (UDAG)

- d. The Reservoir Salvage Act of 1960 as amended by the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. 469 et seq.), particularly section 3 (16 U.S.C 469a-1).

## **7. Man-made Hazards**

- a. Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature, 24 CFR Part 51, Subpart C, (49 FR 5103, 2/10/84).
- b. HUD Notice 79-33, Policy Guidance to Address the Problems Posed by Toxic Chemicals and Radioactive Materials, 9/10/79.
- c. Siting of HUD Assisted Projects in Runway Clear Zones at Civil Airports and Clear Zones and Accident Potential Zones at Military Airfields, 24 CFR Part 51, Subpart D (49 FR 880, 1/6/84)

## **8. Noise**

- a. Noise Abatement and Control, 24 CFR Part 51, Subpart B, (44 FR 40861, 7/12/79, as amended at 61 FR 13333, 3/26/96).

## **9. Solid Waste Disposal**

- a. Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act of 1976 (42 U.S.C. 6901-6987).
- b. U.S. Environmental Protection Agency (EPA) Implementing Regulations 40 CFR Parts 240-265.

## **10. Water Quality**

- a. Federal Water Pollution Control Act, as amended (33 U.S.C. 1251-1376).
- b. The Safe Drinking Water Act of 1974, as amended (42 U.S.C. 69-01-6978, 300f-300j-10).
- c. U.S. Environmental Protection Agency (EPA) Implementing Regulations 40 CFR Parts 100-149.
- d. Missoula, Montana Sole Source Aquifer, in accordance with Section 1424 (e) of the Safe Drinking Water Act, 42 U.S.C. Section 300h-3 (1982).

## **11. Wetlands**

- a. Executive Order 11990, Protection of Wetlands, May 24, 1977 (42 FR 26961), 3 CFR,

1977 Comp., particularly sections 2 and 5; and Applicable State Legislation or Regulations.

## **12. Wild and Scenic Rivers**

- a. Wild and Scenic Rivers Act of 1968 (16 U.S.C. 1271 et. seq.) as amended, particularly section 7(b) and (c), (16 U.S.C. 1278 (b) and (c)).

**Note:** *In Montana, this act applies to the North Fork of the Flathead River from the Canadian border downstream to its confluence with the Middle Fork; the Middle Fork from its headwaters to its confluence with the South Fork; and the South Fork from its origin to Hungry Horse Reservoir; and, the Missouri River consisting of the segment from Fort Benton, one hundred and forty-nine miles downstream to Fred Robinson Bridge.*

## **13. Environmental Justice**

- a. Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, February 11, 1994 (59 FR 7629), 3 CFR, 1994 Comp. P. 859. (24 CFR Part 58.5, April 30, 1996)

## **14. Lead-based Paint**

HUD Lead-based Paint Standards (24 CFR Part 35) and Sections 1012 and 1013 of the Residential Lead-Based Paint Hazard Reduction Act that appear within Title X of the Housing and Community Development Act of 1992.

## **15. Asbestos**

OSHA's asbestos standard (29 CFR 1926.1101) and EPA asbestos sections of NESHAP (National Emission Standard for Hazardous Air Pollutants), administered by Montana Department of Environmental Quality's Asbestos Control Program

## APPENDIX A

Project Map

Wetlands Map



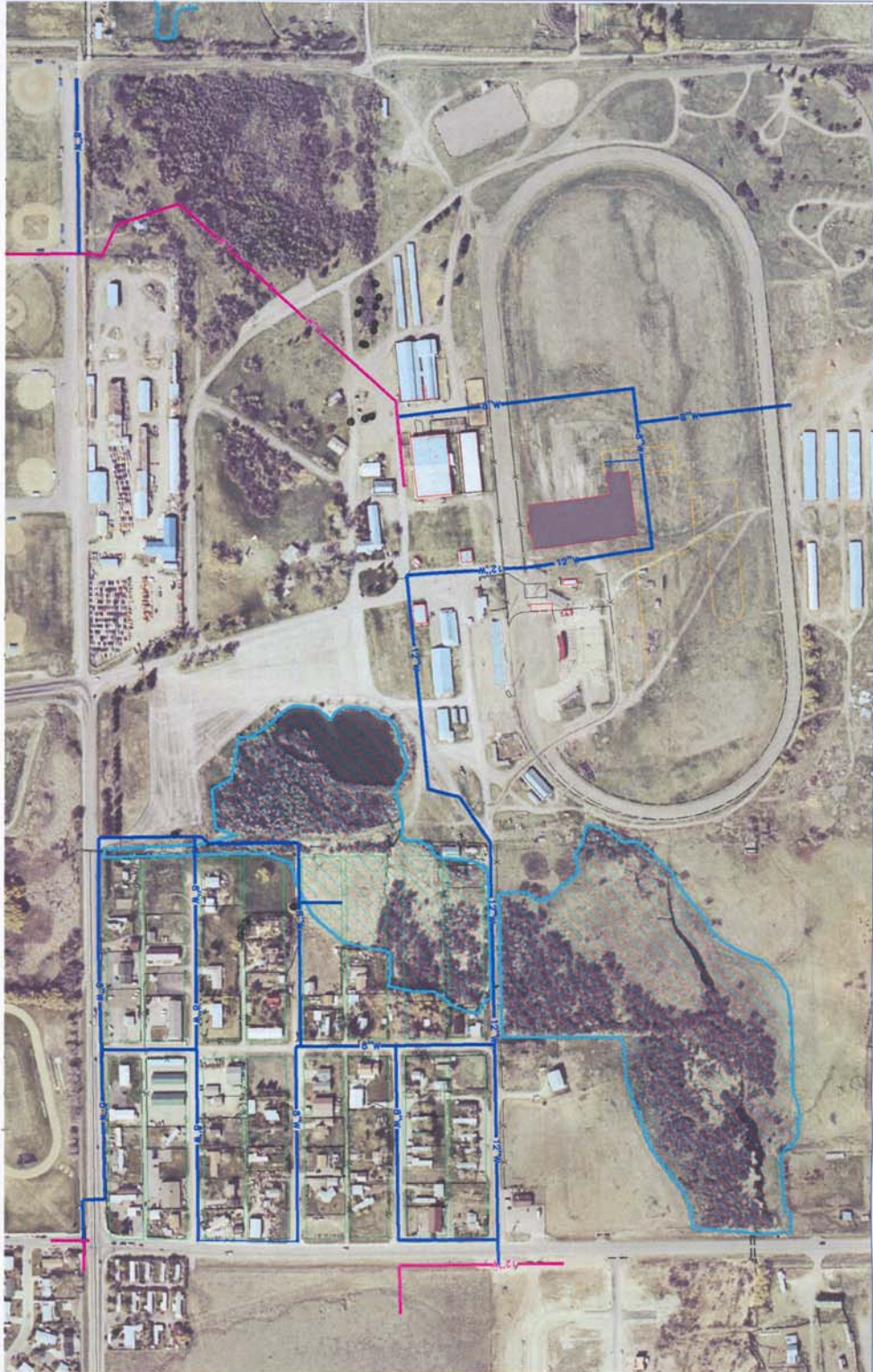
- LEGEND
- NEW 8" WATER MAIN
  - NEW 12" WATER MAIN
  - EXISTING 8" WATER MAIN
  - EXISTING 12" WATER MAIN



EXISTING WETLAND

EXISTING WETLAND BORDER

0 250 500 1000  
SCALE IN FEET



**STAHLY ENGINEERING & ASSOCIATES**  
Professional Engineers  
& Surveyors

3530 Centennial Dr.  
Helena, MT 59601  
Phone (406) 242-8859  
Fax (406) 242-8867  
E-Mail: staehyengr@mt.net

7585 Shedhorn Drive  
Bozeman, MT 59718  
Phone (406) 322-8528  
Fax (406) 322-8528  
E-Mail: staehyengr@mt.net

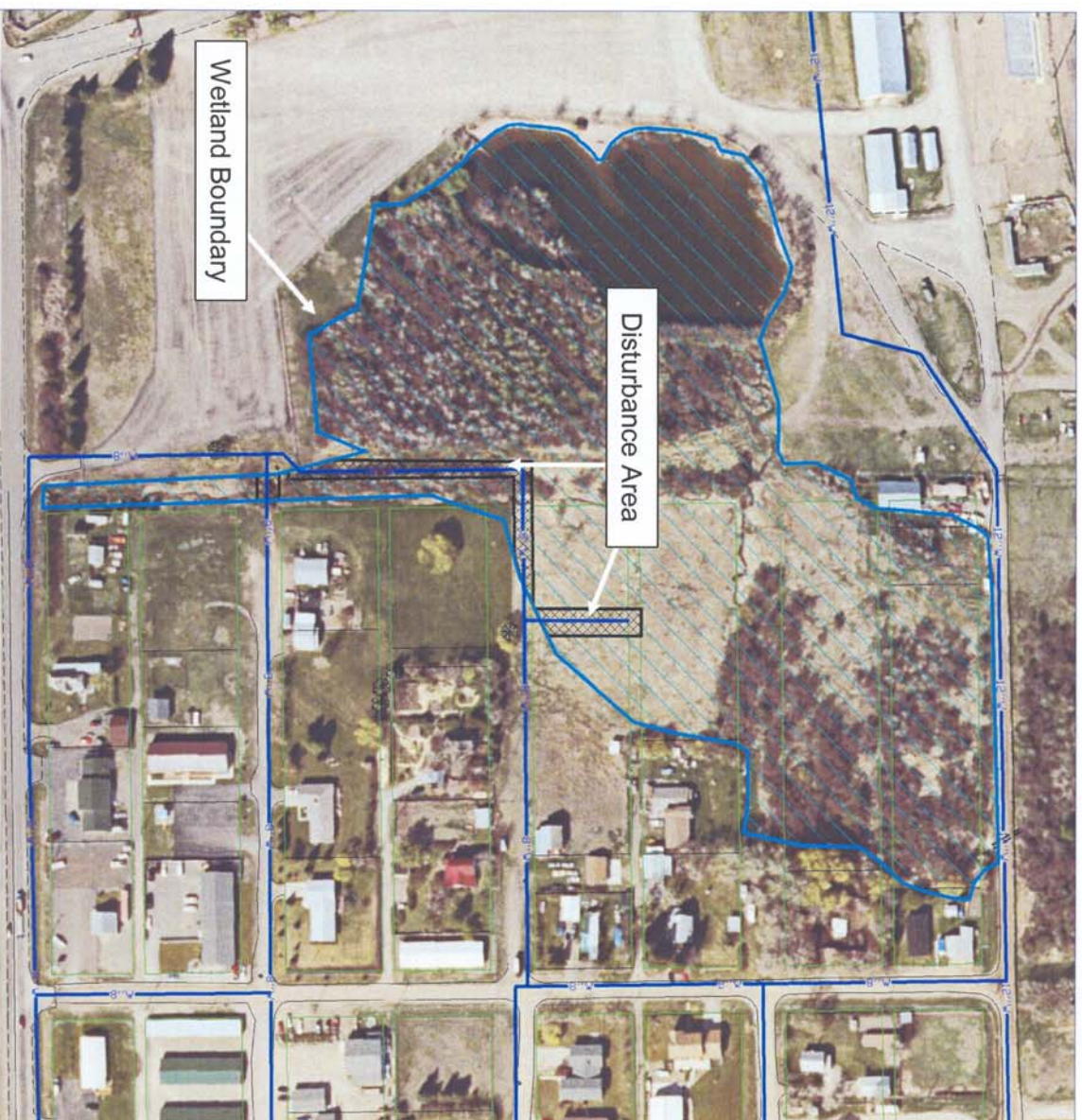


**PROPOSED WATER MAIN IMPACT ON WETLAND**

FAIRGROUNDS/WOODLAWN WATER SYSTEM  
HELENA, MONTANA

DWG. 0147-05507

# Wetland Impacts During Construction of Fairgrounds/Dunbar Water System Connection to City of Helena



## APPENDIX B

Plant Inventory

Wetlands Mitigation Plan

Fairgrounds Pond Bird Inventory

# Attachment A

## A List of Vegetation Observed in the Proposed Lewis and Clark County Fairgrounds Wastewater Infrastructure Improvement Disturbance Corridor From 7-8 am July 25, 2007 By Patrick Plantenberg Plants, Etc. 133 N. Maple

Townsend, MT 59644

Common Name	Scientific Name	Native/Introduced
Quaking Aspen	<i>Populus tremuloides</i>	N
Chokecherry	<i>Prunus virginiana</i>	N
Red Osier Dogwood	<i>Cornus stolonifera</i>	N
Wood's Rose	<i>Rosa woodsii</i>	N
Golden currant	<i>Ribes aureum</i>	N
Cattails	<i>Typha latifolia</i>	N
Tartarian Honeysuckle	<i>Lonicera tartarica</i>	I
Native willows	<i>Salix</i> spp.	N
River Birch	<i>Betula occidentalis</i>	N
Canary reedgrass	<i>Phalaris arundinacea</i>	I
Quackgrass	<i>Agropyron repens</i>	I
Redtop	<i>Agrostis alba</i>	I
Russian Olive	<i>Eleagnus angustifolia</i>	I
Canada Thistle	<i>Cirsium arvense</i>	I (noxious weed)
Bedstraw	<i>Galium</i> spp.	N
Curlycup Gumweed	<i>Grindelia squarrosa</i>	N
Deadly Nightshade	<i>Solanum dulcamara</i>	I
Foxtail Barley	<i>Hordeum jubatum</i>	N
Curly Dock	<i>Rumex crispus</i>	N
Smooth Bromegrass	<i>Bromus inermis</i>	I
Wild Licorice	<i>Glycyrrhiza lepidota</i>	N
Gooseberry	<i>Ribes</i> spp.	N
Berteroa	<i>Berteroa incana</i>	I
Yellow sweetclover	<i>Melilotus officinalis</i>	I
Cottonwood	<i>Populus</i> spp.	I
Houndstongue	<i>Cynoglossum officinale</i>	I (noxious weed)
Bull thistle	<i>Cirsium vulgare</i>	I (noxious weed)
Laurel leaf Willow	<i>Salix pentandra</i>	N
Burdock	<i>Arctium minus</i>	N
Mountain Ash	<i>Sorbus acuparia</i>	I

Watercress	<i>Rorippa nasturtium-aquaticum</i>	N
Caragana	<i>Caragana arborescens</i>	I
Garrison Creeping Foxtail		I
Catnip	<i>Nepeta cataria</i>	I
Black Medic	<i>Medicago sativa</i>	I
Aster	<i>Aster</i> spp.	N
American Speedwell	<i>Veronica americana</i>	N
Loesel's Mustard	<i>Sisymbrium loeselii</i>	I
Timothy	<i>Phleum pratense</i>	I
Colorado Blue Spruce	<i>Picea glauca</i>	I
Kentucky Bluegrass	<i>Poa pratensis</i>	I
Silverweed	<i>Potentilla anserina</i>	N
Dandelion	<i>Taraxacum officinale</i>	I
Stinging Nettles	<i>Urtica dioica</i>	N
Common milkweed	<i>Asclepius speciosa</i>	N
Boxelder	<i>Acer negundo</i>	N
Buckthorn	<i>Rhamnus catarica</i>	I
Shrubby Cinquefoil	<i>Potentilla fruticosa</i>	N
Spotted knapweed	<i>Centaurea maculosa</i>	I (noxious weed)
Orach	<i>Atriplex hortensis</i>	I
Tartarian Maple	<i>Acer tartarica</i>	I
Scotch Pine	<i>Pinus sylvestris</i>	I

# FAIRGROUNDS/DUNBAR WATER SYSTEM CONNECTION TO THE CITY OF HELENA

## WETLAND MITIGATION PLAN SUMMARY

The Lewis and Clark Fairgrounds and adjoining residential neighborhoods (Dunbar and Woodlawn Subdivisions) will be connected to the City of Helena's water and sewer services beginning in the latter part of 2007. The new lines will require disturbance of existing wetlands located along the eastern side of the Fairgrounds to accommodate a 20 foot right-of-way and construction corridor. This plan is intended to mitigate the disturbance through the wetland area.

### Site Preparation

Wetland mitigation will occur over areas impacted by water and sewer pipe installation. Woody vegetation (trees and shrubs) will be removed from the corridor prior to soil salvage. Six inches of soil will be salvaged over the corridor. Following construction, salvaged soil will be re-spread.

### Planting Plan

Fall seeding is planned prior to the ground freezing. In the event that the schedule is delayed until after the ground freezes, spring planting will occur. Shrub plantings will occur in selected areas as well.

Seed (Table 1) will be purchased from a commercial supplier, with the stipulation that it be collected within the northern Intermountain West Region (i.e. western Montana, Idaho, and/or northwest Wyoming) and will be tested for germination. The seed would be blended prior to seeding.

<b>Table 1 Seeding Specifications Lewis &amp; Clark County Fairgrounds/Dunbar Sewer &amp; Water Project</b>		
<b>Scientific Name</b>	<b>Common Name</b>	<b>(lbs/ac.)</b>
<i>Agrostis alba</i>	Redtop	1.00
<i>Carex utriculata</i>	Beaked sedge	4.00
<i>Juncus balticus</i>	Baltic rush	0.30
<b>Total</b>		<b>5.30</b>

- Rates are Pure Live Seed and based on broadcast seeding.  
Seeding rates would be halved if drill seeding were used.

Woody vegetation, including trees and shrubs (Table 2), will be spaced randomly, but at least 4 ft apart. Seven plants would be planted in each of the shrubby areas cut by the

right-of-ways along the eastern boundary of the Fairgrounds. Fifteen shrubs will be planted along the north south corridor on the east side of the Duck Pond and south of the to-be-constructed service road where presently a limited number of shrubs exist.

<b>Table 2</b>		
<b>Planting Specifications</b>		
<b>Lewis &amp; Clark County</b>		
<b>Fairgrounds/Dunbar Sewer &amp; Water Project</b>		
<b>Scientific Name</b>	<b>Common Name</b>	<b>Planting #</b>
<i>Salix bebbiana</i>	Bebb's willow	15
<i>Prunus virginiana</i>	Choke cherry	25
<i>Populus tremuloides</i>	Quaking aspen	10

Plants will be furnished in a 5-gallon minimum container size. Plants will be grown in Montana and be in their container a minimum of 12 months. Plants would not be root-bound, weak, or malformed and would be approved by a project management prior to planting

FAIRGROUNDS POND BIRD LIST – August 2007  
Compiled by Bob Martinka, Last Chance Audubon & Montana Audubon

Grebes – Pied-billed Grebe

Cormorants & Pelicans – *White Pelican (Species of Concern)* and Double-crested Cormorant

Hérons & Egrets – Great Blue Heron and Black-crowned Night Heron

Ducks, Geese & Swans – Canada Goose, Wood Duck, Eurasian Wigeon,  
American Wigeon,  
Green-winged Teal, Mallard, Northern Pintail, Blue-winged Teal,  
Common Goldeneye, Hooded Merganser

New World Vultures – Turkey Vulture

Osprey – Osprey

Hawks, Eagles and Kites – Sharp-shinned Hawk, *Northern Goshawk (Species of Concern)*  
and Red-tailed Hawk

Falcons & Caracaras – Merlin

Cranes – Sandhill Crane

Rails & Coots – American Coot

Plovers & Lapwings – Killdeer

Sandpipers – Wilson's Snipe, Solitary Sandpiper and Spotted Sandpiper

Gulls – Ring-billed Gull, California Gull and Franklin's Gull

Terns – *Caspian Tern (Species of Concern)*

Pigeons & Doves – Rock Pigeon and Mourning Dove

Owls – Great Horned Owl

Kingfishers – Belted Kingfisher

Woodpeckers - Red-naped Sapsucker, Down Woodpecker, Hairy Woodpecker  
and

Northern Flicker

## FAIRGROUNDS POND BIRD LIST – August 2007

Tyrant Flycatchers – Western Wood-Pewee, Willow Flycatcher, Least Flycatcher,  
Western Kingbird and Eastern Kingbird

Swallows – Tree Swallow, Violet-green Swallow, Northern Rough-winged Swallow,  
Bank Swallow, Cliff Swallow and Barn Swallow

Kinglets – Ruby-crowned Kinglet

Waxwings – Bohemian Waxwing and Cedar Waxwing

Wrens – Winter Wren, House Wren and Marsh Wren

Mockingbirds, etc – Gray Catbird

Thrushes – Mountain Bluebird, Swainson's Thrush and American Robin

Chickadees and Tits – Black-capped Chickadee and Mountain Chickadee

Shrikes – Northern Shrike

Crows & Jays – Blue Jay, Black-billed Magpie, American Crow and Common  
Raven

Starlings – European Starling

Vireos & Allies – Cassin's Vireo and Red-eyed Vireo

Wood Warblers – Orange-crowned Warbler, Yellow Warbler, Yellow-rumped  
Warbler,

American Red-start, Northern Waterthrush, MacGillivray's  
Warbler,

Common Yellowthroat and Wilson's Warbler

Tanagers & Allies – Western Tanager

Sparrows, Towhees & Juncos – American Tree Sparrow, Chipping Sparrow,  
Clay-colored Sparrow, Vesper Sparrow, Song Sparrow,  
Lincoln's Sparrow, White-crowned Sparrow and Brambling

Cardinals & Allies – Black-beaked Grosbeak and Lazuli Bunting

Blackbirds & Orioles – Red-winged Blackbird, Western Meadowlark, Brewer's Blackbird,  
Common Grackle, Brown-headed Cowbird and Bullock's Oriole

### FAIRGROUNDS POND BIRD LIST – August 2007

Finches, Siskins & Crossbills – House Finch, Common Red-pole, Pine Siskin, American Goldfinch,  
Evening Grosbeak

Old World Sparrows – House Sparrow

Total Species = 102

Species of Concern – White Pelican, Northern Goshawk and Caspian Tern